

THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,

Plaintiff,

VS.

LYKART TECHNOLOGIES LLC,
GROWKART, TRANSFORN SR
BRANDS LLC, KMAR, KMAR.COM,
SEARS, SEARS.COM, ALPHABET
INC., GOOGLE LLC, YOUTUBE.COM,
POSHMARK INC., STL PRO, INC.,
TARGET CORPORATION,
TARGET.COM, TOTALHILL.COM,
MICROSOFT CORPORATION, INC.,
APPLE INC. and MOZILLA
CORPORATION

Defendants.

Case No. 3:22-cv-1754

Judge Joseph F. Saporito, Jr.

Referred to: Phillip J. Caraballo

JURY TRIAL DEMANDED

FILED
SCRANTON
APR - 1 2025
PER _____
DEPUTY CLERK

PLAINTIFF'S BRIEF IN SUPPORT OF MOTION TO STAY

Plaintiff submits this brief in support of the Motion to Stay Proceedings Pending Ruling in Related Case.

The related case, Catanzaro v. Walmart Stores, Inc., et al., Case No. 3:22-cv-01768, involves overlapping factual and legal issues. The motions pending in that case—specifically for default judgment and sanctions and default judgment—have been pending for a substantial period, and their resolution may significantly affect the posture and scope of the present action, or conversely, this case may impact the outcome of Case No. 3:22-cv-01768.

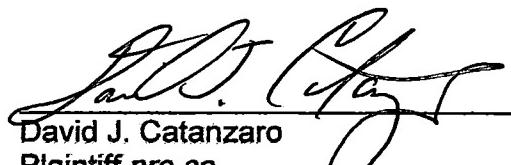
Both cases are pending before District Judge Joseph F. Saporito, Jr. and referred to Magistrate Judge Phillip J. Caraballo. Staying this action would promote orderly case management by allowing the Court to resolve the pending motions in the related matter first, thereby reducing duplication and ensuring consistency in the Court's rulings.

Granting a stay would also promote judicial efficiency and protect Plaintiff from potential prejudice caused by moving forward in one action while core issues remain unresolved in the other.

For the reasons set forth herein and in the accompanying Motion, Plaintiff respectfully requests that the Court stay all proceedings in this matter pending resolution of the related motions in Case No. 3:22-cv-01768.

Date April 1, 2025

Respectfully submitted,



David J. Catanzaro
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CERTIFICATE OF SERVICE

I, David J. Catanzaro, hereby certify that on April 1, 2025, a true and correct copy of Plaintiff's Brief in Support of Motion to Stay was served as follows:

For Represented Defendants:

Pursuant to Fed. R. Civ. P. 5(b)(2)(C), service was made by **U.S. Mail to one counsel of record** for each represented defendant at their official firm mailing address. As a courtesy, copies were also sent via **email** to all additional known counsel of record for the respective parties.

Served by First Class U.S. Mail:

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For Unrepresented Defendants:

The following two defendants have not appeared in this case and are not represented by counsel. Copies of the foregoing document were served by First Class U.S. Mail to the last known business address shared by both entities:

Lykart Technologies, LLC, and GrowKart
30 N Gould St Suite 5707
Sheridan, WY 82801, US

These defendants are presently in default, and Plaintiff reserves the right to move for entry of default as appropriate.

Date April 1, 2025



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